

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FORD MOTOR COMPANY, *et. al.*,

Plaintiffs,

Civil No. 00-71544

v.

Hon. Robert H. Cleland

GREATDOMAINS.COM, INC., *et. al.*,

Defendants.

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U.S. DIST. COURT CLERK
EAST DIST. MICH.
DETROIT

02 AUG 20 2002 PM 10:00

FILED

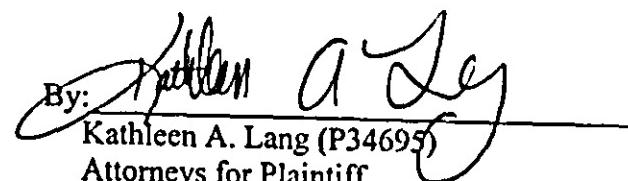
NOTICE OF HEARING

PLEASE TAKE NOTICE that Plaintiffs' Motion For Entry of Default Judgment will be brought on for hearing before the Hon. Robert H. Cleland in his courtroom

2100

located at 231 W. Lafayette Boulevard, Room 707, Detroit, Michigan, 48226 on a date and time to be set by the Court.

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DATED: August 20, 2002

DETROIT 18260-1537 648128

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses as disclosed on the pleading August 20, 2002.

By: Via Mail FAX
 Hand Delivered Overnight Courier
 Federal Express Other:

I declare under penalty of perjury that the statement above is true to the best of my information, knowledge and belief.

Signature Kathleen Lang

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PLAINTIFFS' MOTION FOR ENTRY OF
DEFAULT JUDGMENT

Pursuant to Rule 55 of the *Federal Rules of Civil Procedure*, Plaintiffs Ford Motor Company, Jaguar Cars Limited, Aston Martin Lagonda Limited, and Volvo Trademark Holding AB (collectively “Plaintiffs”) respectfully move the Court for the entry of a Default Judgment against the following defendants (hereafter collectively the “Defaulting Defendants”), based on the Defaulting Defendants’ failure to plead or otherwise defend, including the entry of permanent injunctive relief and providing for the immediate transfers of the offending domain names listed below:

- 2⁶ Dreamsites, registrant of <gaylorford.com>
- 3⁴ Internet Development Corp., registrant of <fordcentral.com>, <forddeals.com>, and <fordheadquarters.com>
- 5⁶ Greg Kays, registrant of <ford-jaguar.com>
- 6⁸ Maksim Muzichenko, registrant of <lincolnshowrooms.com>, <fordshow.com>, <fordshowrooms.com>, and <jaguarshowrooms.com>
- 6⁷ Anton Muzichenko, registrant of <volvoshow.com>, <volvoshwroom.com>, and <volvoshowrooms.com>
- 7⁵ Zero Games, registrant of <preownedmustang.com>
- 1⁴ EIDC, registrant of <mustangmuscle.com>
- 6¹ Jimmy McClaren, registrant of <rustywallecford.com>
- 5⁰ Mustang Market, registrant of <fordbodyparts.com>
- 4² Royalyork, registrant of <fordautosales.com>
- 8⁷ Victor B. Tucker, registrant of <jaguar-f1-racing.com>
- 8¹ Eric Yen, registrant of <fordtoday.com>, <volvo4u.com>, <volvocenter.com>
- 1⁰ Diego Decal, registrant of <fordus.com>
- 1³ Domain For Sale by ACE, registrant of <57tbird.com>
- 9⁶ Buy Direct Products, Inc., registrant of <lincolnmercuryredcarpetlease.com>

5¹ Rich O'Reilly, registrant of <fordchevy.com>, <fordchevracing.com>

The grounds for Plaintiffs' Motion are set forth more fully in the Declaration of Kathleen A. Lang, which is submitted as Exhibit "A" to Plaintiffs' Memorandum In Support of Motion for Default Judgment." The facts are essentially as follows: On March 29, 2000 a Complaint was filed against the Defaulting Defendants alleging claims for cyberpiracy, trademark infringement, and trademark dilution arising out of the Defaulting Defendants' registration of Internet domain names incorporating Plaintiffs' world-famous and registered trademarks, and the Defaulting Defendants' use of and trafficking in such domain names. [Dkt. 1, Complaint ¶¶ 9-132 at 8-30] Each of the Defaulting Defendants has either: (1) been served with a copy of the Complaint and an original summons (as set forth more fully in the Lang Decl.), or (2) waived service by executing and returning a signed Waiver of Service.

As set forth more fully in Plaintiffs' Memorandum In Support Of Motion For Entry Of Default Judgment, submitted with this Motion, Plaintiffs have pleaded facts conclusively establishing the Defaulting Defendants' liability for violation of the Anticybersquatting Consumer Protection Act and justifying entry of permanent injunctive relief and the transfers of the infringing domain names.

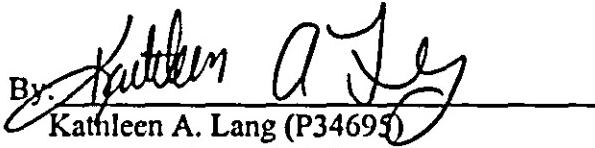
Despite having been served with summonses and copies of the Complaint, the Defaulting Defendants have each failed to plead or otherwise defend.

On July 24, 2002, Clerk's Entry of Defaults were entered against Defaulting Defendants Dreamsites, Internet Development Corp, Greg Kays, Maksim Muzichenko, Anton Muzichenko, Zero Games, EIDC, Jimmy McClaren, Mustang Market, Royal York, Victor B. Tucker and Eric Yen. (See Exhibit A.) Clerks' Entry of Defaults were

also entered on August 5, 2002, against Defaulting Defendants Domain For Sale by Ace, Diego Decal, Buy Direct Products and Rich O'Reilly. (See Exhibit B.)

WHEREFORE, Plaintiffs respectfully request that the Court enter a Default Judgment in the form submitted with this Motion as Exhibit C.

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DATED: August 20, 2002

DETROIT 18260-1537 673523

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

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